

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS SUSAN M. LACHANCE
(APWU/USPS-T13-1-4)
(January 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Susan M. LaChance (USPS-T-13). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T13-1 The Postal Service has indicated that towns that lose their mail processing facility as a result of an AMP will still be able to have their mail cancelled with the local postmark. While this appears true immediately after a facility has closed, the postmarks do not always remain available.

- a) What is the Postal Service's current policy regarding local postmarks when the mail is no longer locally cancelled?
- b) What is the Postal Service's plan for areas that lose mail processing facilities as a result of Network Rationalization?

APWU/USPS-T13-2 How does a postal customer get their mail locally cancelled if the cancellation equipment no longer exists in the area as the result of an AMP?

APWU/USPS-T13-3 How much does it cost per piece to get a local postmark after a mail processing facility has been closed on:

- a) One mail piece?
- b) 100 mail pieces?
- c) 1,000 mail pieces?
- d) 100,000 mail pieces?
- e) 1,000,000 mail pieces?
- f) over 1,000,000 mail pieces?

APWU/USPS-T13-4 For locations where the BMEUs are left open after the processing facility has been closed, please confirm that mailers are still permitted to drop their mail at these BMEUs.

- a) In this situation, will the mailer still receive the same discount it received before the facility closure?
- b) If not, what must a mailer do to maintain its discount?